

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND  
SOUTHERN DIVISION

ALICIA BROWN,

Plaintiff,

v.

Case No. 8:18-cv-02612-PWG

JOHNNIE TURNER, *et al.*

Defendants.

\* \* \* \* \*

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

Pursuant to Local Rule 101.2.b, Stan Brown, Esq. and the Stan Derwin Brown Law Office, LLC, respectfully requests that this Court grant Stan Brown, Esq.'s motion to withdraw his appearance as attorney of record for Defendant Johnnie Turner in this matter. In support of this motion, Stan Brown, Esq. states as follows:

1. On August 8, 2018 Defendant Mr. Johnnie Turner executed a written Retainer Agreement with Stan Brown, Esq. and the Stan Derwin Brown Law Office, LLC.

2. The Retainer Agreement required an initial \$1,500.00 consultation fee and a \$400.00 per hour rate for legal services. As of the date of this motion the Defendant Johnnie Turner has a) paid the \$1,500.00 initial consultation fee, and b) paid \$4,000.00 for ten (10) hours of legal services. Defendant Johnnie Turner owes counsel for sixty-one (61) hours of legal services which totals

\$24,300.00.

Stan Brown, Esq.  
Stan Derwin Brown Law Office, LLC  
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E-mail: attorney@StanBrown.net



3. Attorney Stan Brown, Esq. and the Stan Derwin Brown Law Office, LLC appeared on behalf of Defendant Johnnie Turner on September 4, 2018 by filing the original *Answer to Complaint by Johnnie Turner* in this matter.

4. On November 15, 2018, counsel informed Defendant Johnnie Turner by email, that Stan Brown, Esq. would be compelled to file a motion to withdraw as counsel if Defendant Johnnie Turner failed to make the attorney fee payments required by the Retainer Agreement prior to the scheduled December 5, 2018 motions hearing.

5. In accordance with Local Rule 101.2.a, on March 15, 2019, Stan Brown, Esq. sent a letter by *U.S. Priority Mail* to Defendant Johnnie Turner advising the client of counsel's proposed withdrawal and notifying the client either to have new counsel enter an appearance or to advise the Clerk that the client will be proceeding without counsel. On March 18, 2019, the March 15, 2019 letter was sent by email to Defendant Johnnie Turner.

6. Defendant Johnnie Turner has not responded to any of Stan Brown, Esq.'s numerous letters, emails or telephone calls since early January 2019.

7. Defendant Johnnie Turner's last known address is 4500 S. Four Mile Run Drive. Apt. 434, Arlington, Virginia 22204.

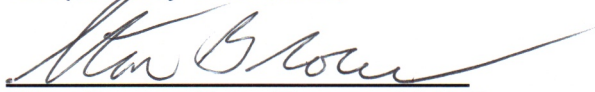
**WHEREFORE**, Stan Brown, Esq. and the Stan Derwin Brown Law Office, LLC, respectfully requests that the Court grant counsel's leave to withdraw as attorney of record for Defendant Johnnie Turner in this action.





Dated: March 26, 2019

Respectfully Submitted,



Stan Brown, Esq. (Bar no. 06431)  
Stan Derwin Brown Law Office, LLC  
1300 Caraway Court, Suite 101  
Largo, Maryland 20774  
**Counsel for Defendant Johnnie Turner**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of March 2019 a copy of the above-noted **Motion for Leave to Withdraw as Counsel** was served on all counsel of record via this Court's electronic filing system (CM/ECF) and/or by first class U.S. mail, postage prepaid to the following persons:

John T. Prisbe, Esq. (Bar No. 04669)  
Ashleigh J.F. Lynn, Esq. (Bar No. 30122)  
Venable LLP  
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**Attorneys for Defendant, NVR, Inc.**

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ajlynn@Venable.com

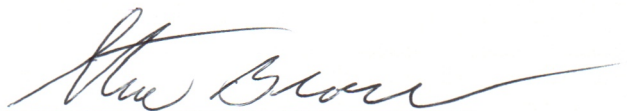
Gerald F. Miles, Sr., Esq. (Bar no. 00107)  
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**Attorneys for Plaintiff, Alicia Brown**

Mr. Johnnie Turner  
4500 S. Four Mile Run Drive, Apt. 434  
Arlington, Virginia 22204  
**Defendant**

Turner.Johnnie@gmail.com



Stan Brown, Esq.



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\* \* \* \* \*

**ORDER**

Having reviewed the Motion for Leave to Withdraw as Counsel for  
Defendant Johnnie Turner and receiving no objections, it is this\_\_day of \_\_\_\_  
2019

**ORDERED** that the Motion for Leave to Withdraw as Counsel for  
Defendant Johnnie Turner is hereby GRANTED, and Stan Brown, Esq. and the  
Stan Derwin Brown Law Office, LLC are relieved of any and all further duties in  
this matter.

\_\_\_\_\_  
Judge, United States District Court  
for the District of Maryland

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